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11 *Counsel for Defendants*

12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 OLIVIER JOUIN, an individual,
15 Plaintiff,
16 v.

17 GREATER NEVADA WINDOWS AND
18 DOORS, LLC a Delaware limited liability
19 company; ESLER COMPANIES, LLC a
20 Delaware limited liability company;
21 RENEWAL BY ANDERSEN, LLC, a
Delaware limited liability company.

Case No. 2:25-cv-00971-CDS-DJA

**STIPULATION TO EXTEND TIME TO
RESPOND TO COMPLAINT**

(SECOND REQUEST)

22 WHEREAS Plaintiff filed his Complaint on June 2, 2025.

23 WHEREAS Defendants Greater Nevada Windows and Doors, LLC; Esler Companies, LLC;
24 and Renewal by Andersen, LLC (“Defendants”) were served with Summons and the Complaint on
25 June 5, 2025.

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27 WHEREAS a response to the Complaint is due by Defendants Greater Nevada Windows and
28 Doors, LLC; Esler Companies, LLC; and Renewal by Andersen, LLC on June 26, 2025.

1 WHEREAS, the parties agreed and stipulated to an extension to respond to the Complaint
2 through and including July 16, 2025, and that stipulation was filed on or before the deadline for the
3 response to the Complaint on June 20, 2025. [ECF No 9]. However, the Magistrate denied it without
4 prejudice, indicating that the stipulation failed to state the reason for the requested extension. [ECF
5 No. 10].
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7 WHEREAS, pursuant to FRCP 6(b)(1)(A) and LR IA 6-1(a), as good cause therefore,
8 Defendants' counsel states that (i) they need additional time to obtain and review file documents and
9 communicate with Defendants to coordinate filing a proper response; notably, this case involves three
10 (3) different defendants; (ii) additional counsel is in the process of finalizing its petition to appear *pro*
11 *hac vice* in this matter; and (iii) counsel for Defendants has other professional obligations, including
12 an appellate brief that is due July 2, 2025.
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14 This Stipulation is filed in good faith and not for the purpose of delay. This is the second
15 request.

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1 IT IS HEREBY STIPULATED BETWEEN THE PARTIES, through their attorneys of record
2 that the deadline for Defendants Greater Nevada Windows and Doors, LLC; Esler Companies, LLC;
3 and Renewal by Andersen, LLC to respond to the Complaint be extended twenty days to July 16,
4 2025.

5 Respectfully submitted this 24th day of June, 2025.

7 By: /s/ Arthur A. Zorio
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15 *Counsel for Defendants*

By: /s/ Marian L. Massey
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Counsel for Plaintiff

17 **IT IS SO ORDERED.**

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20 UNITED STATES MAGISTRATE JUDGE

21 Dated this 25th day of June, 2025

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of BROWNSTEIN HYATT FARBER SCHRECK, LLP, and on this 24th day of June, 2025, I served the document entitled **STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT** on the parties listed below via the following:

☐ **VIA FIRST CLASS U.S. MAIL:** by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States mail at Reno, Nevada for delivery to the following attorneys for Plaintiff:

☐ **VIA COURIER FOR PERSONAL DELIVERY:** by delivering a copy of the document to a courier service for personal hand-delivery to the below, whereby the courier signs a certificate specifying the date of actual hand-delivery.

☐ **VIA COURIER:** by delivering a copy of the document to a courier service for over-night delivery to the foregoing parties.

☒ **VIA ELECTRONIC SERVICE:** by electronically filing the document with the Clerk of the Court using the ECF No./eFlex system which served the following parties electronically:

☐ **VIA ELECTRONIC SERVICE:** as an attachment to electronic mail directed to counsel for Plaintiff at the email address listed below.

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